Snell & Wilmer LLP. LAW OFFICES 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169 702.784.5200	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27	S DISTRICT COURT OF NEVADA CASE NO. 2:15-cv-02230 STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO COMPLAINT (First Request)
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Plaintiff 2-Way Computing, Inc. ("2-Way") and Defendants AT&T Mobility LLC and
AT&T Mobility II LLC (collectively, "ATTM") by and through their counsel, hereby file this
Stipulation and [Proposed] Order to Extend the Deadline to Respond to Complaint. This request
complies with Local Rules ("LR") 6-1, 6-2, and 7-1. The litigation of this matter will be best
served by the proposed extension. This is the first request to extend the response deadline. This
request is not made after the response deadline.

The Complaint [Doc. No. 1] was filed on November 25, 2015. Defendant AT&T was served with the summons and complaint on December 16, 2015. The current deadline to respond to the Complaint is January 6, 2016.

Due to the intervening holidays and the need for AT&T to retain outside counsel, pursuant to a telephone conversation with AT&T, Plaintiff is agreeable to extend the deadline for AT&T to respond to the Complaint for thirty (30) days, until February 5, 2016. Pursuant to LR 26-1, the deadline to schedule a 26(f) conference will be triggered by AT&T's filing its Answer.

Accordingly, Plaintiff and Defendants respectfully request that the Court grant this request to continue the deadline to respond to the Complaint.

Respectfully Submitted,

Dated: January 5, 2016

BORGHESE LEGAL, LTD.

By: <u>s/Mark Borghe</u>se Mark Borghese, Esq. Nevada Bar No. 6231 10161 Park Run Drive, Suite 150 Las Vegas, NV 89145 702-382-0200 Fax: 702-382-0212 Attorney for Plaintiff

SNELL & WILMER

By: s/Kelly H. Dove Kelly H. Dove, Esq. Nevada Bar No. 10569 10161 Park Run Drive, Suite 150 Las Vegas, NV 89145 702-382-0200 Fax: 702-382-0212 Attorney for Defendants

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	1	<u>ORDER</u>
Snell & Wilmer LAW OFFICES 3883 Howard Hughes Parkway, Suire 1100 Las Vegas, Nevada 89169 702.784.5200	2	IT IS SO ORDERED.
	3	DATED this 5th day of January , 2016.
	4	DATED this day of, 2010.
	5	U.S. MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE** 2 I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen 3 (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be 4 served a true and correct copy of the foregoing STIPULATION AND [PROPOSED] ORDER 5 TO EXTEND DEADLINE TO RESPOND TO COMPLAINT by the method indicated: 6 U.S. Mail 7 U.S. Certified Mail 8 Facsimile Transmission 9 Overnight Mail 10 Federal Express 11 Hand Delivery 12 X Electronic Filing/ECF 13 and addressed to the following: 14 Mark R. Borghese Email: mark@borgheselegal.com 15 Borghese Legal, Ltd. 16 Reza Mirzaie 17 Email: rmirzaie@raklaw.com Paul S. Kroeger 18 Email: pkroeger@raklaw.com 19 Stanley H. Thompson, Jr. Email: sthompson@raklaw.com 20 C. Jay Chung Email: jchung@raklaw.com 21 Russ, August & Kabat 22 Attorneys for Plaintiff 2-Way Computing, Inc. 23 24 DATED: January 5, 2016 _/s/ Ruby Lengsavath_ 25 An Employee of Snell & Wilmer L.L.P. 26 23252699 27 28